

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE**

*In Re:*

**Tavares Sental Williams,**

Case No. **16-29448-L**

Chapter 13

*Debtor(s).*

**MOTION TO MODIFY CHAPTER 13 PLAN**

**COMES NOW** the Chapter 13 Debtor, Tavares Sental Williams, by and through the undersigned attorney, S. Jonathan Garrett, and moves this Honorable Court to modify the Chapter 13 Plan after confirmation. In support of the Motion, Debtor would respectfully show unto the Court the following:

1. The jurisdiction and venue are proper;
2. Debtor filed for relief under Chapter 13 Bankruptcy of the United States Bankruptcy Code on October 13, 2016;
3. That Debtor's Chapter 13 Plan was confirmed on January 25, 2017;
4. That pursuant to the CARES Act, 11 U.S.C. §1329 (d)(1), Debtor has suffered a material financial hardship directly due to the COVID-19 pandemic. Debtor's material financial hardship was caused by loss of employment for a period of five months, and securing new employment at a lower compensation rate;
5. That due to the material financial hardship Debtor has been unable to make the Chapter 13 Plan payment and pay his minimal living expenses;
6. That an increase in Debtor's Chapter 13 Plan payment to complete the plan within 60 months would cause an additional material financial hardship.
7. That Debtor wishes to extend the term of this case by 24 months, reduce monthly payments to secured and Class I unsecured creditors to pay out over the extended term of this case, and adjust the Chapter 13 plan payment;

**WHEREFORE, PREMISES CONSIDERED**, your Debtor prays that a hearing be set in which an order be entered to:

1. That Debtors case be extended an additional twenty-four (24) months;
2. That monthly payment to American Credit Acceptance be adjusted to \$135.00;
3. That the monthly payment to Criminal Court Clerk be adjusted to \$35.00;

4. That the monthly payment to Hope Community Credit Union fdba American Savings be adjusted to \$11.00;
5. That the monthly payment to BSI Financial Services, Inc. be adjusted to \$259.00;
6. That Debtors' Chapter 13 plan payment be reduced to \$640.00 per month; and
7. For any other such further relief to which the Court deems just and proper.

Respectfully submitted,

/s/S. Jonathan Garrett  
S. Jonathan Garrett (019389)  
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**CERTIFICATE OF SERVICE**

I, S. Jonathan Garrett, attorney for Debtor(s), certify that on February 10, 2021, I have delivered the foregoing Motion via hand delivery, email, facsimile and/or US Mail, postage prepaid on the following parties:

Debtor(s)  
Chapter 13 Trustee  
Creditors

/s/ S. Jonathan Garrett  
S. Jonathan Garrett